

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MELISSA KAYE,

Plaintiff,

-against-

NEW YORK CITY HEALTH AND HOSPITALS  
CORPORATION; ELIZABETH FORD; PATRICIA  
YANG; ABHISHEK JAIN; and JONATHAN  
WANGEL (said names being fictitious, the persons  
intended being those who aided and abetted the  
unlawful conduct of the names Defendants),

Defendants.  
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**DEFENDANTS’  
SUPPLEMENTAL  
LOCAL RULE 56.1  
STATEMENT OF  
UNDISPUTED  
MATERIAL FACTS**

18-cv-1573 (JGK)

Pursuant to Local Rule 56.1 of the Civil Rules of this Court, Defendants New York City Health and Hospitals Corporation (“H+H”), Elizabeth Ford, Patricia Yang, Abhishek Jain, and Jonathan Wangel (collectively “defendants”) by and through their attorney submit this additional statement of material facts as to which there is no genuine issue to be tried:

1. In 2007, Plaintiff received a salary of \$159,299. *See* Personnel Action Form, dated January 14, 2008, annexed to the Second Supplemental Canfield Declaration (“Second Supp. Canfield Decl.”), as Exhibit “AAAAAA.”

2. In July 2008, Dr. Ciric was appointed to the Physician Specialist III title from the Attending Physician III title, and received a salary increase from \$144,413 to \$160,413. *See* Personnel Action Form, effective July 1, 2008, annexed to the Second Supp. Canfield Decl. as Exhibit “BBBBBB.”

3. In 2009, Plaintiff received a salary increase to \$172,573. *See* Personnel Action Form, effective March 15, 2009, annexed to the Second Supp. Canfield Decl. as Exhibit “CCCCCC.”

Dated: New York, New York  
September 9, 2022

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